

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN AIRLINES, INC., ET AL.,	:	07 Civ. 7051 (AKH)
Plaintiffs,	:	
	:	
-against-	:	This document relates to:
	:	21 MC 101 (AKH)
FEDERAL BUREAU OF INVESTIGATION,	:	
ET AL.,	:	
Defendants.	:	
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**DECLARATION OF RICHARD A. WILLIAMSON IN OPPOSITION TO THE  
MOTION OF THE AVIATION DEFENDANTS FOR SUMMARY JUDGMENT  
SETTING ASIDE THE FEDERAL BUREAU OF INVESTIGATION'S  
REFUSAL TO ALLOW THE DEPOSITIONS OF CERTAIN WITNESSES**

RICHARD A. WILLIAMSON, an attorney admitted to practice law in the State of New York and before this Court, declares under the penalties of perjury that the following is true and correct, pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm Flemming Zulack Williamson Zauderer LLP. I submit this declaration on behalf of the plaintiffs (collectively, the "Plaintiffs") in the *In re September 11 Business Loss and Property Damage Litig.*, 21 MC 101 (AKH) (the "September 11 Litigation"), in order to place certain documents before the Court that are relevant to the Plaintiffs' opposition to the motion of the Aviation Defendants for summary judgment setting aside the determination of Federal Bureau of Investigation ("FBI"), denying their request to take the depositions of five FBI witnesses.

2. Attached as **Exhibit 1** hereto is a true and correct copy of excerpts from the transcript of the March 18, 2008 conference in the September 11 Litigation.

3. Attached as **Exhibit 2** hereto is a true and correct copy of a March 14, 2008 letter from AUSA Sarah S. Normand to the Honorable Alvin K. Hellerstein in the September 11 Litigation.

4. Attached as **Exhibit 3** hereto is a true and correct copy of a May 5, 2008 letter from Desmond T. Barry, Jr., Esq., to AUSA Beth Goldman in the September 11 Litigation.

5. Attached as **Exhibit 4** hereto is a true and correct copy of the WTCP Plaintiffs' Flight 11 Complaint in the September 11 Litigation, dated April 17, 2008.

6. Attached as **Exhibit 5** hereto is a true and correct copy of the WTCP Plaintiffs' Flight 175 Complaint in the September 11 Litigation, dated April 17, 2008.

7. Attached as **Exhibit 6** hereto is a true and correct copy of excerpts from the Sixth Amended Master Property Complaint Against Airline and Security Company Defendants in the September 11 Litigation.

8. Attached as **Exhibit 7** hereto is a true and correct copy of excerpts from the Fourth Amended Flight 11 Master Liability Complaint in the September 11 Litigation.

9. Attached as **Exhibit 8** hereto is a true and correct copy of excerpts from the Fourth Amended Flight 175 Master Liability Complaint in the September 11 Litigation.

10. Attached as **Exhibit 9** hereto is a true and correct copy of excerpts from the Third Amended Flight 93 Master Liability Complaint in the September 11 Litigation.

11. Attached as **Exhibit 10** hereto is a true and correct copy of excerpts from the Fourth Amended Flight 77 Master Liability Complaint in the September 11 Litigation.

12. Attached as **Exhibit 11** hereto is a true and correct copy of excerpts from the transcript of the February 26, 2007 conference in the September 11 Litigation.

13. Attached as **Exhibit 12** hereto is a true and correct copy of excerpts from the transcript of the March 22, 2007 conference in the September 11 Litigation.

14. Attached as **Exhibit 13** hereto is a true and correct copy of the transcript from the June 14, 2007 conference in the September 11 Litigation.

15. Attached as **Exhibit 14** hereto is a true and correct copy of excerpts from a publication of the U.S. Department of Transportation ("DOT"), Federal Aviation Administration ("FAA"), *Troubled Passage: The Federal Aviation Administration During the Nixon-Ford Term, 1973-1977* (1987).

16. Attached as **Exhibit 15** hereto is a true and correct copy of the newspaper article, Dave Hirschman, *Cockpit Security: Terrorist Techniques Looked Familiar to Ex-Pilot*, Atlanta J. & Const., Oct. 1, 2001.

17. Attached as **Exhibit 16** hereto is a true and correct copy of excerpts from a publication of the DOT, FAA, Office of Civil Aviation Security, *Criminal Acts Against Aviation* (1999).

18. Attached as **Exhibit 17** hereto is a true and correct copy of the newspaper article, Mitchell Zuckoff, *Summer Games Staff Alert to Terrorism*, Boston Globe, Sept. 14, 2000.

19. Attached as **Exhibit 18** hereto is a true and correct copy of the newspaper article, *Hijacker fails in try to force 747 to crash*, UPI (1974).

20. Attached as **Exhibit 19** hereto is a true and correct copy of the newspaper article, David Wise, *Omens of Terror*, LA. Times, Oct. 7, 2001.

21. Attached as **Exhibit 20** hereto is a true and correct copy of Security Directive SD-96-03I, which was issued by the DOT, FAA, on December 15, 2007.

22. Attached as **Exhibit 21** hereto is a true and correct copy of Civil Aviation Security Information Circular IC-98-13, which was issued by the DOT, FAA, on October 8, 1998.

23. Attached as **Exhibit 22** hereto is a true and correct copy of a publication of the DOT, Office of Intelligence and Security, *Transportation Security and Terrorism Review* (2001).

24. Attached as **Exhibit 23** hereto is a true and correct copy of excerpts from American Airlines' Air Carrier Standard Security Program, Appendix XV.

25. Attached as **Exhibit 24** hereto is a true and correct copy of excerpts from the transcript of the February 11-12, 2008 deposition of Robert Cammaroto.

26. Attached as **Exhibit 25** hereto is a true and correct copy of Civil Aviation Security Information Circular IC-2000-01, which was issued by the DOT, FAA, on April 27, 2000.

27. Attached as **Exhibit 26** hereto is a true and correct copy of excerpts from a memorandum that was issued by the DOT, FAA, on October 30, 2000, concerning "Worldwide Threat Questions and Answers."

28. Attached as **Exhibit 27** hereto is a true and correct copy Civil Aviation Security Information Circular IC-2001-04, which was issued by the DOT, FAA, on April 18, 2001.

29. Attached as **Exhibit 28** hereto is a true and correct copy of Civil Aviation Security Information Circular IC-2001-04A, which was issued by the DOT, FAA, on July 31, 2001.

30. Attached as **Exhibit 29** hereto is a true and correct copy of the DOT publication, *Terrorist Threat Overview for the United States* (Feb. 2001).

31. Attached as **Exhibit 30** hereto is a true and correct copy of an excerpt from the Final Rule on Airport Security, published by the DOT, FAA, on July 17, 2001, at 66 Fed. Reg. 37,313.

32. Attached as **Exhibit 31** hereto is a true and correct copy of excerpts from the transcript of the May 23, 2008 deposition of James Miller, Jr.

33. Attached as **Exhibit 32** hereto is a true and correct copy of excerpts from the transcript of the July 17, 2007 deposition of Stephen J. Wallace.

34. Attached as **Exhibit 33** hereto is a true and correct copy of the FBI's interview of a former checkpoint screener for Globe, dated September 17, 2001.

35. Attached as **Exhibit 34** hereto is a true and correct copy of American Airlines Incident Report, Incident Number 0-0000005272.

36. Attached as **Exhibit 35** hereto is a true and correct copy of an excerpt from the transcript of the February 14, 2002 episode of The O'Reilly Factor.

37. Attached as **Exhibit 36** hereto is a true and correct copy of the transcript of the Fox 25 (Boston) television broadcast on airport security, which aired on May 6, 2001.

38. Attached as **Exhibit 37** hereto is a true and correct copy of a CD containing the Fox 25 (Boston) television broadcast on airport security, which aired on May 6, 2001.

39. Attached as **Exhibit 38** hereto is a true and correct copy of a memorandum from Joseph M. Lawless to Virginia Buckingham, dated April 27, 2001.

40. Attached as **Exhibit 39** hereto is a true and correct copy of excerpts from the transcript of the March 30, 2007 deposition of Joseph M. Lawless.

41. Attached as **Exhibit 40** hereto is a true and correct copy of excerpts from a publication of the DOT, FAA, Office of Civil Aviation Security, *Criminal Acts Against Aviation* (2000).

42. Attached as **Exhibit 41** hereto is a true and correct copy of the newspaper article, Blake Morrison, *Mother gropes for answers in death aboard jet*, USA Today, Sept. 22, 2000.

43. Attached as **Exhibit 42** hereto is a true and correct copy of the Proposed Stipulation of Facts, proposed by Plaintiffs in the September 11 Litigation.

44. Attached as **Exhibit 43** hereto is a true and correct copy of an excerpt from American Airlines' Checkpoint Operation Guide.

45. Attached as **Exhibit 44** hereto is a true and correct copy of an excerpt from American Airlines' Air Carrier Standard Security Program, Appendix I.

46. Attached as **Exhibit 45** hereto is a true and correct copy of excerpts from the transcript of the December 14, 2006 deposition of Trandafire Bala.

47. Attached as **Exhibit 46** hereto is a true and correct copy of excerpts from the transcript of the November 6, 2007 deposition of Hemsley Myles.

48. Attached as **Exhibit 47** hereto is a true and correct copy of excerpts from the transcript of the September 13, 2006 deposition of Rosarita Rivera.

49. Attached as **Exhibit 48** hereto is a true and correct copy of excerpts from the transcript of the October 18, 2007 deposition of Yosmaris (Santa) Guerrero.

50. Attached as **Exhibit 49** hereto is a true and correct copy of excerpts from the transcript of the July 26, 2007 deposition of Camille M. Summa.

51. Attached as **Exhibit 50** hereto is a true and correct copy of excerpts from the transcript of the January 16, 2007 deposition of William T. Thomas.

52. Attached as **Exhibit 51** hereto are true and correct copies of sales receipts and credit card settlement statements for the knives, blades, and box cutters that the hijackers purchased prior to September 11, 2001, as produced by the FBI.

53. Attached as **Exhibit 52** hereto are true and correct copies of a description and photographs of the knives found at the United Airlines Flight 93 crash site, as produced by the FBI.

54. Attached as **Exhibit 53** hereto is a true and correct copy of FBI laboratory photographs.

55. Attached as **Exhibit 54** hereto is a true and correct copy of excerpts from the transcript of the March 1, 2007 deposition of Nydia Gonzalez.

56. Attached as **Exhibit 55** hereto is a true and correct copy of the September 11, 2001 interview of a United Airlines employee by the FBI.

57. Attached as **Exhibit 56** hereto is a true and correct copy of excerpts from the transcript of the October 12, 2007 deposition of Theodore B. Olson.

58. Attached as **Exhibit 57** hereto is a true and correct copy of excerpts from the FAA Handbook 8400.10 CHG 10.

59. Attached as **Exhibit 58** hereto is a true and correct copy of excerpts from the FAA Handbook 8300.10 CHG 9.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated: June 17, 2008

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/s/  
RICHARD A. WILLIAMSON